

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Amanda Braatz, individually and on)
behalf of all others similarly situated,)
)
Plaintiff,)
)
v.) No. 11 C 3835
)
Leading Edge Recovery Solutions, Inc.,) Judge Shadur
an Illinois limited liability company, and)
LVNV Funding, LLC, a Delaware limited)
liability company,)
)
Defendants.)

**JOINT MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT AGREEMENT**

Plaintiff, Amanda Braatz, and Defendants, Leading Edge Recovery Solutions, Inc. and LVNV Funding, LLC, submit this Joint Motion, pursuant to Fed. R. Civ. P. 23, for preliminary approval of the Class Action Settlement Agreement. In support of this motion, the parties' state:

1. A Class Action Settlement Agreement, dated August 23, 2012, and attached as Exhibit 1, has been entered into by the parties.
2. The proposed Class Notice is attached as Exhibit 2.
3. The proposed Order Granting Preliminary Approval to the Class Action Settlement Agreement is attached as Exhibit 3.
4. The parties represent to the Court:
 - A. That the proposed settlement was reached through arms-length negotiations between Plaintiff's Counsel and Defendants' Counsel;

- B. That the proposed settlement is fair, reasonable and adequate to the members of the Class in light of the alleged violation by Defendants of the FDCPA; and,
- C. That the Settlement Agreement represents the compromise of disputed claims, that it in no way constitutes an admission of liability by Defendants with respect to any of the material allegations in the Complaint, and that Defendants specifically deny that its actions constitute a violation of the FDCPA to any extent whatsoever.

5. Plaintiff's Counsel represents to this Court that they are able, experienced and well-qualified to evaluate the fairness of the proposed settlement on behalf of the members of the Class and that Counsel are in favor of this Motion. The Declaration of Plaintiff's Counsel, David J. Philipps, setting forth his experience and qualification is attached as Exhibit 4.

WHEREFORE, the parties request that this Court grant preliminary approval to the Class Action Settlement Agreement and enter the order attached as Exhibit 3.

Dated: September 17, 2012

Plaintiff's Counsel,

/s/ David J. Philipps

David J. Philipps (Ill. Bar No. 06196285)
Mary E. Philipps (Ill. Bar No. 06197113)
Philipps & Philipps, Ltd.
9760 S. Roberts Road, Suite One
Palos Hills, Illinois 60465
(708) 974-2900
(708) 974-2907 (FAX)
davephilipps@aol.com

Defendants' Counsel,

/s/ Nabil G. Foster

Nabil G. Foster (Ill. Bar No. 06273877)
Hinshaw & Culbertson, LLP
222 North LaSalle Street
Suite 300
Chicago, Illinois 60601
nfoster@hinshawlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2012, a copy of the foregoing **Joint Motion For Preliminary Approval Of Class Action Settlement Agreement** was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Nabil G. Foster
Hinshaw & Culbertson, LLP
222 North LaSalle Street
Suite 300
Chicago, Illinois 60601
nfoster@hinshawlaw.com

/s/David J. Philipps
David J. Philipps
Philipps & Philipps, Ltd.
9760 S. Roberts Road
Suite One
Palos Hills, Illinois 60465
davephilipps@aol.com